

Air Permit Review

Permit Issue Date: **date, 2011**

Region: Mooresville Regional Office
County: Iredell
NC Facility ID: 4900225
Inspector's Name: Tonisha Dawson
Date of Last Inspection: 03/17/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Transcontinental Gas Pipeline Company, LLC</p> <p>Facility Address: Transcontinental Gas Pipeline Company, LLC 236 Transco Road Mooresville, NC 28115</p> <p>SIC: 4922 / Natural Gas Transmission NAICS: 48621 / Pipeline Transportation of Natural Gas</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 4900225.11A Date Received: 07/01/2011 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08044/T13 Existing Permit Issue Date: 07/10/2009 Existing Permit Expiration Date: 04/30/2012</p>
<p>Mark Doss District Manager (704) 892-7631 236 Transco Road Mooresville, NC 28115</p>	<p>Mark Bisett Manager, Environmental Compliance (713) 215-2000 PO Box 1396 Houston, TX 77251+1396</p>	<p>Cecilia Chapa Engineer II (713) 215-2964 PO Box 1396 Houston, TX 77251+1396</p>	
<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2011</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08044/T14 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016</p>	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**08044T13**) was issued on **July 10, 2009**, with an expiration date of **April 30, 2012**. The renewal application was received on **July 1, 2011**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility operates a natural gas compressor station. Permitted equipment includes sixteen mainline and three auxiliary compressor units, two internal combustion engines for air supply, and two natural gas-fired boilers for building heat.

III. History/Background/Application Chronology

May 29, 2007 – Permit **08044T11** issued as a Title V renewal.

May 15, 2008 – Permit **08044T12** issued as a minor modification to move blow down operations from insignificant activity list to permitted source list.

July 10, 2009 – Permit **08044T13** issued as a significant modification to add both NOx and VOC RACT requirements.

June 8, 2010 – Applicability Determination No. 1593 requesting turbine exchange as a means of maintenance is approved without permit modification.

March 17, 2011 – Tonisha Dawson of the MRO completed annual inspection of the facility.

July 1, 2011 – Permit application **4900225.11A** was received as TV renewal application. Application was deemed complete for processing.

July 12, 2011 – Received MRO comments on the TV renewal application via email.

August 3, 2011 – Draft permit sent to regional office and Permittee for review prior to public notice and EPA review. The Permittee provided comments via email on **August 10, 2011**. Tonisha Dawson of the MRO had no additional comments and related this via phone call on **August 19, 2011**.

date, 2011 – Draft permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Attachment	Insignificant activities	-amended permit revision number
Cover	-	-amended permit revision number and all dates
All	Header	-amended permit revision number
3-4	Equipment table	-added RICE MACT (Subpart ZZZZ) designation where needed
5	2.1 A.1.b 2.1 A.2.b	-corrected testing rule cross reference -corrected testing rule cross reference
6	2.1 A.3.b 2.1 A.4.a.iii 2.1 A.4.b	-corrected testing rule cross reference -corrected rule language presented in permit condition -corrected testing rule cross reference
7	2.1 B.1.b	-corrected testing rule cross reference
9	2.1 B.3.b 2.1 B.3.c 2.1 B.4.a 2.1 B.4.b	-corrected testing rule cross reference -updated shell language -added ID numbers -corrected testing rule cross reference
10	2.1 C (table) 2.1 C.1.b	-added RICE MACT (Subpart ZZZZ) as applicable regulation for these sources -corrected testing rule cross reference

Page	Section	Description of Change
11	2.1 C.2.b 2.1 C.3.b 2.1 C.3.c	-corrected testing rule cross reference -corrected testing rule cross reference -updated shell language
12	2.1 D (table) 2.1 D.1.b 2.1 D.2.b	-added RICE MACT (Subpart ZZZZ) as applicable regulation for this source -corrected testing rule cross reference -corrected testing rule cross reference
13	2.1 D.3.b 2.1 D.3.c	-corrected testing rule cross reference -updated shell language
14	2.1 D.5.d 2.1 E (table) 2.1 E.1.b	-cross reference correction -added RICE MACT (Subpart ZZZZ) as applicable regulation for this source -corrected testing rule cross reference
15	2.1 E.2.b 2.1 E.3.b 2.1 E.3.c 2.1 E.4.d	-corrected testing rule cross reference -corrected testing rule cross reference -updated shell language -corrected cross reference
17	2.2 A 2.2 A.1 (table)	-amended source description to add applicable sources -added RICE MACT (Subpart ZZZZ) as applicable regulation for these sources
18-24	2.2 A.2	-added RICE MACT (Subpart ZZZZ) permit condition
24	2.2 B.1.b	-corrected testing rule cross reference
26-36	General Conditions	-updated shell conditions (v3.4)
37	List of Acronyms	-added acronyms for CAIR and NAA per current shell

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0501, Compliance with Emission Control Standards
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart GG)
- 15A NCAC 2D .0902, Applicability
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR63, Subpart YYYY)
- 15A NCAC 2D .1408, Stationary Combustion Turbines
- 15A NCAC 2D .1409, Seasonal Emission Rate for Large Combustion Sources
- 15A NCAC 2D .1412, Petition for Alternative Limitations
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration and 15A NCAC 2D .1402, Applicability)

A regulatory review for these existing requirements will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee operates one natural gas-fired dry low NOx combustion turbine (**ID No. ES-M/L16**) subject to New Source Performance Standards (40 CFR 60, Subpart GG). The source is subject to a NOx limitation of less than 201 parts per million at 15 percent oxygen and to a SO₂ limitation of 150 parts per million at 15 percent oxygen. The current permit includes monitoring/recordkeeping/reporting requirements. This permit renewal does not affect this status.

NESHAPS/MACT/112j – The Permittee currently operates one source (**ID No. ES-M/L16**) subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (40 CFR 63, Subpart YYYY). While subject, this unit has no requirements per 40 CFR 63.6090(b)(4). This permit renewal does not affect this status.

During the last permit renewal cycle, all existing units were analyzed for applicability to the National Emission Standards for Hazardous Air Pollutants for Stationary Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). Mainline units one through 16 were each determined to be applicable with no requirements per 40 CFR 63.6590(b)(3). This permit renewal does not affect this status.

The Permittee also operates these auxiliary units (**ID Nos. ES-AUX1 through AUX3, A/C1, and A/C2**). At the time of the last permit renewal, these units were determined to not have any requirements under this Subpart because of a size exemption found in 40 CFR 63.6590(b)(3). However, EPA promulgated modifications to this Subpart on **January 18, 2008, March 3, 2010, and August 20, 2010**. As part of these modifications, these units lost their exemption from the Subpart. As existing non-emergency spark ignition 4 stroke rich burn engines (4SRB) with a brake horsepower rating between 100 and 500 horsepower located at a major source of HAPs, these units are now subject to the following requirements (Source - EPA Summary Table October 2010):

Requirements	Existing Non-Emergency Spark Ignition 4SRB (100≤Hp≤500)
Compliance Date	October 19, 2013
Emission Limitations	63.6602 Table 2c
Operating Limitations	NA
Fuel Requirements	NA
Performance Tests	63.6612 63.6620 Table 4 Table 5
Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(h)
Initial Compliance	63.6630 Table 5
Continuous Compliance	63.6605 63.6640
Notification Requirements	63.6645
Recordkeeping Requirements	63.6655 (except (c), (e), and (f))
Reporting Requirements	63.6650 (except (g))

The following permit condition has been added as Section 2.2 A.2 for these sources:

2. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. For these sources (**ID Nos. ES-AUX1 through ES-AUX3, ES-A/C1, and ES-A/C2**), the Permittee shall demonstrate compliance by **October 19, 2013** with all applicable requirement of 15A NCAC 2D .1111 "Maximum Achievable Control Technology" and 40 CFR 63 Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)."

Emission Limitations [40 CFR 63.6595, 63.6602, and Table 2c]

- b. The Permittee must limit the concentration of formaldehyde in the exhaust to 10.3 ppmvd or less at 15 percent oxygen. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to this Subpart.

Testing and Initial Compliance Requirements [40 CFR 63.6612, 63.6620, and Table 4]

- c. The Permittee shall conduct the following initial performance test or other initial compliance demonstration by **April 17, 2004** according to the provisions in §63.7(a)(2).
- i. The Permittee complying with the requirement to limit the concentration of formaldehyde in the exhaust must:
- A. Select the sampling port location and the number of traverse points using Method 1 or 1A of 40 CFR part 60, appendix A §63.7(d)(1)(i). If using a control device, the sampling site must be located at the outlet of the control device;
- B. Determine the O₂ concentration of the stationary RICE exhaust at the sampling port location using Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522-00 (2005). Measurements to determine O₂ concentration must be made at the same time and location as the measurements for formaldehyde concentration;
- C. Measure moisture content of the stationary RICE exhaust at the sampling port location using Method 4 of 40 CFR part 60, appendix A, or Test Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348-03. Measurements to determine moisture content must be made at the same time and location as the measurements for formaldehyde concentration; and
- D. Measure formaldehyde at the exhaust of the stationary RICE using Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348-03, provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent R must be greater than or equal to 70 and less than or equal to 130. Formaldehyde concentration must be at 15 percent O₂, dry basis. Results of this test consist of the average of the three 1-hour or longer runs.
- d. The Permittee is not required to conduct an initial performance test on a unit for which a performance test meeting the following conditions has been previously conducted:
- i. The test must have been conducted using the same methods specified in this subpart, and these methods must have been followed correctly.
- ii. The test must not be older than 2 years.
- iii. The test must be reviewed and accepted by the Administrator, EPA Region IV.
- iv. Either no process or equipment changes must have been made since the test was performed, or the Permittee must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process or equipment changes.

- e. For each non-operational stationary RICE that is subject to performance testing, the Permittee does not need to start up the engine solely to conduct the performance test. The Permittee can conduct the performance test when the engine is started up again.
- f. The Permittee must conduct three separate test runs for each performance test required in this section, as specified in §63.7(e)(3). Each test run must last at least 1 hour.
- g. The Permittee shall:
 - i. Use Equation 1 of this section to determine compliance with the percent reduction requirement:

$$\frac{C_i - C_o}{C_i} \times 100 = R \quad (\text{Eq. 1})$$

Where:

- C_i = concentration of formaldehyde at the control device inlet,
- C_o = concentration of formaldehyde at the control device outlet, and
- R = percent reduction of formaldehyde emissions.
- ii. Normalize the formaldehyde concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide (CO_2). If pollutant concentrations are to be corrected to 15 percent oxygen and CO_2 concentration is measured in lieu of oxygen concentration measurement, a CO_2 correction factor is needed. Calculate the CO_2 correction factor as follows:
 - A. Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation:

$$F_o = \frac{0.209 F_d}{F_c} \quad (\text{Eq. 2})$$

Where:

- F_o = Fuel factor based on the ratio of oxygen volume to the ultimate CO_2 volume produced by the fuel at zero percent excess air.
- 0.209 = Fraction of air that is oxygen, percent/100.
- F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).
- F_c = Ratio of the volume of CO_2 produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).
- B. Calculate the CO_2 correction factor for correcting measurement data to 15 percent oxygen, as follows:

$$X_{\text{co}_2} = \frac{5.9}{F_o} \quad (\text{Eq. 3})$$

Where:

- X_{co_2} = CO_2 correction factor, percent.
- 5.9 = 20.9 percent O_2 – 15 percent O_2 , the defined O_2 correction value, percent.
- C. Calculate the NO_x and SO_2 gas concentrations adjusted to 15 percent O_2 using CO_2 as follows:

$$C_{adj} = C_d \frac{X_{CO_2}}{\%CO_2} \quad (\text{Eq. 4})$$

Where:

$\%CO_2$ = Measured CO_2 concentration measured, dry basis, percent.

- h. If the Permittee complies with the emission limitation to limit the concentration of formaldehyde in the stationary RICE exhaust and is not using an oxidation catalyst or NSCR, he must petition the Administrator, EPA Region IV for operating limitations to be established during the initial performance test and continuously monitored thereafter; or for approval of no operating limitations. The petition must include the following information.
- i. Identification of the specific parameters proposed to use as operating limitations;
 - ii. A discussion of the relationship between these parameters and HAP emissions, identifying how HAP emissions change with changes in these parameters, and how limitations on these parameters will serve to limit HAP emissions;
 - iii. A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations;
 - iv. A discussion identifying the methods you will use to measure and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and
 - v. A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters.
- The Permittee must not conduct the initial performance test until after the petition has been approved by the Administrator.
- i. If the Permittee petitions the Administrator for approval of no operating limitations, the petition must include the following information.
- i. Identification of the parameters associated with operation of the stationary RICE and any emission control device which could change intentionally (e.g., operator adjustment, automatic controller adjustment, etc.) or unintentionally (e.g., wear and tear, error, etc.) on a routine basis or over time;
 - ii. A discussion of the relationship, if any, between changes in the parameters and changes in HAP emissions;
 - iii. For the parameters which could change in such a way as to increase HAP emissions, a discussion of whether establishing limitations on the parameters would serve to limit HAP emissions;
 - iv. For the parameters which could change in such a way as to increase HAP emissions, a discussion of how you could establish upper and/or lower values for the parameters which would establish limits on the parameters in operating limitations;
 - v. For the parameters, a discussion identifying the methods you could use to measure them and the instruments you could use to monitor them, as well as the relative accuracy and precision of the methods and instruments;
 - vi. For the parameters, a discussion identifying the frequency and methods for recalibrating the instruments you could use to monitor them; and
 - vii. A discussion of why, from your point of view, it is infeasible or unreasonable to adopt the parameters as operating limitations.
- j. The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report:

- i. the engine model number,
- ii. the engine manufacturer,
- iii. the year of purchase,
- iv. the manufacturer's site-rated brake horsepower,
- v. the ambient temperature, pressure, and humidity during the performance test, and
- vi. all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained.

If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

Monitoring, installation, collection, operation, and maintenance requirements [40 CFR 63.6625]

- k. *The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply.*

Initial compliance [40 CFR 63.6630 and Table 5]

- l. *The Permittee has demonstrated initial compliance with each emission limitation that applies to each source complying with the requirement to limit the concentration of formaldehyde in the exhaust if the average formaldehyde concentration, as applicable, corrected to 15 percent oxygen, dry basis, from the three test runs is less than or equal to the formaldehyde emission limitation, as applicable.*
- m. *During the initial performance test, the Permittee must establish each operating limitation that applies to you.*
- n. *The Permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.6645.*

Continuous Compliance Requirements [40 CFR 63.6640]

- o. *The Permittee must report each instance in which each emission limitation that apply to you was not met. These instances are deviations from the emission limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.6650. With each catalyst change, the values of the operating parameters measured during the initial performance test must be reestablished and a new performance test to demonstrate that the required emission limitations applicable to the source must be conducted.*

Recordkeeping Requirements [40 CFR 63.6655]

- p. *The Permittee must keep the following records:*
 - i. *A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).*
 - ii. *Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.*
 - iii. *Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).*
 - iv. *Records of all required maintenance performed on the air pollution control and monitoring equipment.*

- v. *Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.*
- vi. *For each CEMS or CPMS, you must keep the following records*
 - A. *Records described in 40 CFR 63.10(b)(2)(vi) through (xi).*
 - B. *Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).*
 - C. *Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in 40 CFR 63.8(f)(6)(i), if applicable.*

Notifications and Reporting Requirements [40 CFR 63.6645 and 63.6650]

- q. *The Permittee must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified.*
- r. *The Permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1).*
- s. *The Permittee must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii).*
 - i. *For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, the Notification of Compliance Status must be submitted before the close of business on the 30th day following the completion of the initial compliance demonstration.*
 - ii. *For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, the Notification of Compliance Status, including the performance test results, must be submitted before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2).*
- t. *The Permittee must submit a semiannual compliance report containing the following:*
 - i. *If there are no deviations from any emission limitations that apply to you, a statement that there were no deviations from the emission limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or*
 - ii. *If you had a deviation from any emission limitation during the reporting period, the information in 40 CFR 63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), the information in 40 CFR 63.6650(e); or*
 - iii. *If you had a malfunction during the reporting period, the information in 40 CFR 63.6650(c)(4).*
- u. *The Permittee must submit each semiannual Compliance report postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The Compliance report must contain the following information:*
 - i. *Company name and address.*
 - ii. *Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.*
 - iii. *Date of report and beginning and ending dates of the reporting period.*

- iv. *the number, duration, and a brief description for each type of malfunction, if any, which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.*
- v. *If there are no deviations from any emission limitation that apply to you, a statement that there were no deviations from the emission limitation during the reporting period.*
- vi. *If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.*
- v. *For each deviation from an emission limitation that occurs for a source where you are not using a CMS to comply with the emission limitations in this subpart, the Compliance report must contain the information in paragraphs (u)(1) through (4) above and the following information.*
 - i. *The total operating time of the source at which the deviation occurred during the reporting period.*
 - ii. *Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*
- w. *For each deviation from an emission limitation occurring for a stationary RICE where you are using a CMS to comply with the emission limitations in this subpart, you must include information in paragraphs (u)(1) through (4) above and the following information.*
 - i. *The date and time that each malfunction started and stopped.*
 - ii. *The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.*
 - iii. *The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).*
 - iv. *The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.*
 - v. *A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.*
 - vi. *A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.*
 - vii. *A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.*
 - viii. *An identification of each parameter and pollutant (formaldehyde) that was monitored at the source.*
 - ix. *A brief description of the source.*
 - x. *A brief description of the CMS.*
 - xi. *The date of the latest CMS certification or audit.*
 - xii. *A description of any changes in CMS, processes, or controls since the last reporting period.*

- x. *Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.*

On **February 10, 2011**, the Permittee submitted to DAQ initial notification of applicability for these units. They state “*Transco has identified the above stationary RICE as subject to emission standards specified in 40 CFR 63, Subpart ZZZZ. An evaluation of potential compliance options for the affected sources is currently underway. Compliance options include engine reclassification to emergency status, engine reclassification to limited use status, engine retirement, engine replacement, or engine retrofit. The affected RICE will be in compliance with the applicable requirements by the **October 19, 2013** compliance deadline.*” The permit condition above is for the engines as they are currently classified. If the Permittee does decide to modify the engines as suggested, each option would require that a permit modification be submitted prior to the change. The permit condition would need to be modified at that point to make it consistent with the ultimate decision of the Permittee.

RACT – The Permittee operates fifteen mainline combustion engines, one mainline combustion turbine and five auxiliary combustion engines. These units are subject to the NO_x requirements as described below.

Mainline units 1-15

15A NCAC 2D .0501(e) – This regulation establishes NO_x limits for each unit. Engines one through eight each have no seasonal limits while engines nine through 15 do. No monitoring, recordkeeping, and reporting requirements are required for these sources. This permit renewal does not affect this status.

15A NCAC 2D .1409 – This regulation establishes seasonal NO_x limits for units nine through 15 only. The current permit establishes a testing schedule for each unit as well as monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status.

15A NCAC 2D .1412 – This regulation establishes alternative NO_x limits for sources subject to RACT requirements. The Permittee has requested alternative limits for units one through 11. The current permit establishes a testing schedule for each unit as well as monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status.

Mainline unit 16

15A NCAC 2D .0501(e) – This regulation establishes seasonal NO_x limits for this unit. No monitoring, recordkeeping, and reporting requirements are required for this source. This permit renewal does not affect this status.

15A NCAC 2D .1408(a) – This regulation establishes NO_x limits specific to stationary combustion turbines. The current permit requires annual compliance testing, monitoring, recordkeeping, and reporting. This permit renewal does not affect this status.

Auxiliary Units 1-3, A/C1, and A/C2

15A NCAC 2D .0501(e) – This regulation establishes NOx limits for these units. No monitoring, recordkeeping, and reporting requirements are required for these sources. This permit renewal does not affect this status.

15A NCAC 2Q .0317 (Avoidance for 15A NCAC 2D .1402) – The Permittee currently operates under a hours per year limit for each of these units in order to avoid applicability of the NOx RACT requirements on these units. To ensure compliance, the Permittee shall limit each unit to less than 1,892.6 hours per ozone season (May 1 through September 30) for AUX1 through 3, less than 3,318.9 hours per ozone season for A/C1, and less than 3,609.7 hours per ozone season for A/C2. Monthly records and reporting requirements are also in the current permit. This permit renewal does not affect this status.

Blowdown operations

15A NCAC 2D .0902 – The current permit states that per permit application review, DAQ has determined that RACT for this source is “no additional controls.” This permit renewal does not affect this status.

PSD – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

112(r) – The Permittee is not subject to Section 112(r) of the Clean Air Act requirements because the facility does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Because no control devices are in use at the facility, CAM is not applicable. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

The Permittee is not currently subject to any NC Air Toxics provisions. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

Pollutant(s)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	615.41	636.66
NO _x	1153.46	1109.31
PM ₁₀	48	49.31
SO ₂	0.92	0.91
VOC	296.02	302.39
Total HAP/TAP	170.91	175.56

IX. Stipulation Review

The facility was last inspected by Tonisha Dawson of the MRO on **March 17, 2011**. At that time, the facility appeared to be in compliance with the applicable air quality regulations.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The state of South Carolina and the Mecklenburg and Forsyth County Local Programs are each affected areas within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

MRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with MRO's recommendation to issue the renewed air permit.